U.S. DISTRICT COURT DISTRICT OF MASSACHUSETTS DOCKET NO. 05-10033 NG

LORI ANN MORAN, PLAINTIFF VS. ANDREW DIPASQUA, MICHAEL SANBORN, WILLIAM F. GAY, III and the ONSET FIRE DISTRICT, DEFENDANTS

AFFIDAVIT OF MAURICE HARLOW

- I, Maurice Harlow, state that:
- 1. I reside at Salt Works Road, Onset, Massachusetts.
- 2. I worked at the Onset Water Department for 18 years as a truck driver. I retired in 1988.
- 3. I know the Plaintiff Lori Ann Moran.
- 4. I was present at the meeting of the Onset Board of Water Commissioners when the vote was taken to fire Lori Ann Moran from employment at the Onset Water Department.
- 5. I know the Defendant Andrew DiPasqua, who was an Onset Water

 Commissioner, who voted in favor of terminating Lori Ann Moran from employment at
 the Onset Water Department.
- 6. Before the Onset Board of Water Commissioners meeting at which Lori Ann Moran was fired, I saw Andrew DiPasqua at the beach, and Andrew DiPasqua said "Damned if I do, and damned if I don't. The other four have said they will sue." I said "how are they going to sue". Andrew DiPasqua said "I don't know". I said "maybe you better find out."
- 7. After the hearing, I spoke with Andrew DiPasqua at the beach. I said "you guys had this all set up. You knew what you were doing before that meeting. It wasn't fair. The vote was stacked ahead of time. She [Lori] was fighting against three firemen."

When I said three firemen I meant two commissioners (DiPasqua and Sanborn) and the Water Superintendent (Gay). DiPasqua said "we didn't have a choice. Billy Gay has the licenses, and it would be hard to find someone to take his place". I said there are lots of people that have those licenses".

Signed under the pains and penalties of perjury this 18 day of April 2006.

Maurice Harlow

Maurice Harlow

CERTIFICATE OF SERVICE

I hereby certify that I have served the within document by mailing a copy first class mail postage pre paid to:

John J. Cloherty, III Pierce, Davis, & Perritano, LLP Ten Winthrop Square Boston, MA. 02110

Date: 2 279 700

Margaret A. Ishihara